

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p style="text-align: center;">as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p style="text-align: center;">Debtors.¹</p>	<p>PROMESA</p> <p>Title III</p> <p>Case No. 17-BK-3283 (LTS)</p> <p>(Jointly Administered)</p>
<p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p style="text-align: center;">as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p style="text-align: center;">and</p> <p>THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS (OTHER THAN COFINA),</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>PUERTO RICO PUBLIC BUILDINGS AUTHORITY,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 18-00149</p>

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

**URGENT CONSENTED MOTION SEEKING EXTENSION OF DEADLINE TO FILE A
REPLY IN SUPPORT OF INTERVENTION**

To the Honorable United States Magistrate Judge Judith Gail Dein:

The PBA Funds² respectfully submit this consented Motion (the “Motion”), for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadlines for the QTCB Noteholder Group,³ the PBA Funds, Assured,⁴ Ambac Assurance Corporation, the PBA Sub-Group,⁵ and National Public Finance Guarantee Corporation (together, the “Intervenors,” and along with the Plaintiffs⁶ and the Defendant, the “Parties”) to reply in support of their proposed intervention in this Adversary Proceeding. In support of this Motion, the PBA Funds respectfully represent as follows:

1. The Court has entered a series of scheduling orders establishing (a) February 11, 2019 as the deadline for Plaintiffs and Defendant to object to the Intervenors’ proposed intervention in this Adversary Proceeding and (b) February 18, 2019 as the deadline for the Intervenors to file a reply in support thereof (the “Reply Deadline”). *See* Dkt. Nos. 27, 28, 29, 30, 33.

² *See* Third Supplemental Verified Statement of the PBA Funds Pursuant to Federal Rule of Bankruptcy Procedure 2019 [Case No. 17-3283-LTS, Dkt. No. 4855].

³ The QTCB Noteholder Group has the same meaning as set forth in Notice of Appearance and Request for Notice (Case No. 17-BK-3283 (LTS), Dkt. No. 134) and Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019 [Case No. 17-3283-LTS, Dkt. No. 3765].

⁴ Assured refers to Assured Guaranty Corp. and Assured Guaranty Municipal Corp., collectively.

⁵ The PBA Sub-Group consists of a subset of members of the Commonwealth Bondholder Group as identified in the *Verified Statement of the Commonwealth Bondholder Group Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Case No. 17-3283-LTS, Dkt. No. 4743]. As of the date hereof, the members of the PBA Sub-Group are Canyon Capital Advisors LLC, on behalf of its participating clients; Davidson Kempner Capital Management LP, as investment advisor to its affiliated funds; Monarch Alternative Capital LP, on behalf of certain of the funds and accounts it manages; and OZ Management LP, on behalf of its participating funds and/or accounts.

⁶ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Complaint [Dkt. No. 1]

2. On February 11, 2019, Plaintiffs and the Defendant filed limited objections to the Intervenor's proposed intervention. *See* Dkt. Nos. 42, 43. In the interests of judicial economy the Intervenor has been cooperating in good faith to prepare a single, omnibus reply in support of their collective intervention in this Adversary Proceeding. The Intervenor believes that this collaboration would be facilitated by a brief extension of Reply Deadline, particularly in light of the intervening holiday weekend.

3. Accordingly, the PBA Funds request an order extending the Reply Deadline to **February 21, 2019**. The Intervenor, the Plaintiffs, and the Defendant all consent to the relief requested in the Motion.

4. Pursuant to Paragraph 1.H of the *Eighth Amended Case Management Procedures* [Case No. 17-3283; Dkt. No. 4866-1], the PBA Funds hereby certify that they have carefully examined the matter and concluded that there is a true need for an urgent motion; have not created the urgency through any lack of due diligence; have made a bona fide effort to resolve the matter without a hearing; have made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court; and have conferred with counsel for the Plaintiffs, the Defendant, and the Intervenor, and no party opposes the relief requested herein.

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Dated: February 15, 2019

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Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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<p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p style="text-align: center;">as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p style="text-align: center;">and</p> <p>THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS (OTHER THAN COFINA),</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>PUERTO RICO PUBLIC BUILDINGS AUTHORITY,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 18-00149</p>

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ORDER

This matter is before the Court on the *Urgent Consented Motion Seeking Extension of Deadline to File a Reply in Support of Intervention* [Dkt. No. ____] (the “Motion”).² Taking notice of the agreement among the parties and finding good cause for the requested relief, the Court hereby ALLOWS the Motion in accordance with the following:

1. The Reply Deadline is extended to **February 21, 2019**.

This resolves Dkt. No. ____.

Dated: February __, 2019

THE HONORABLE JUDITH GAIL DEIN
UNITED STATES MAGISTRATE JUDGE

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.